



Coxheath Parish Council

Data Quality Policy

1. Purpose

Article 5(1)(d) UK-GDPR requires that personal data is accurate and, where necessary, kept up to date, and that every reasonable step is taken to erase or rectify inaccurate data without delay.

Accuracy is not only a compliance matter. Records that are wrong produce decisions that are wrong, and the person affected experiences that as the Council not listening.

2. What accuracy means

A record is accurate if it correctly states a matter of fact. Two qualifications matter in practice.

First, a record of an opinion is not inaccurate merely because the person disagrees with the opinion, provided it is clearly recorded as an opinion and correctly attributed. A note that a councillor considered a hedge to be overgrown is accurate as a record of that view.

Second, a historical record is not inaccurate because circumstances have changed. A minute recording what was decided in 2019 remains accurate even though the position is now different. It should not be amended; if anything, the later position is recorded separately.

Records that are misleading through omission may be inaccurate even if every individual statement is true. A record noting that a resident complained, without noting the complaint was upheld, is incomplete in a way that misrepresents them.

3. Practical measures

Measure	How it applies
Collect from the source	Take details from the person themselves rather than assuming or copying from elsewhere
Record the date	A record is only as current as the date it was captured. Undated information cannot be assessed for currency
Distinguish fact from opinion	Record who held an opinion and when, so it is not later read as established fact
Avoid duplicate records	The same person recorded in several places will diverge. Keep one authoritative record
Update on notification	Act on a change of address or name promptly, and check where else it appears
Check before acting	Where a decision depends on a detail, confirm it rather than relying on an old record
Record uncertainty	Where something is unconfirmed, say so, rather than recording it as though established

4. Rectification

A person may ask the Council to correct data about them under Article 16. The Council will:

1. Respond within one calendar month, extendable by two months where complex.
2. Correct the data where it is inaccurate.
3. Where accuracy is disputed and cannot be resolved, record the fact of the dispute alongside the data, so anyone reading it later sees both positions.
4. Consider restricting processing while the position is verified, under Article 18(1)(a).

5. Tell anyone the data has been disclosed to about the correction, unless that proves impossible or involves disproportionate effort, as Article 19 requires.
6. Explain the reasons if the Council declines, and tell the person of their right to complain to the ICO and to seek a judicial remedy.

Statutory records present a particular case. The Council cannot amend a minute of a past meeting to correct a factual error about a person, because the minute is the record of what was resolved. The correct approach is to record the correction in the minutes of a subsequent meeting, so that the record as a whole is accurate. This should be explained to the person rather than presented as a refusal.

5. Responsibilities

The Clerk	Maintains the Council's records; handles rectification requests; reviews data quality as part of the annual retention review
Councillors	Record information accurately; pass corrections to the Clerk rather than amending records independently
Data subjects	Encouraged to tell the Council when their details change

6. Review

Data quality is reviewed as part of the annual retention review, which is the natural point at which records are being examined. A separate exercise would be disproportionate for a council of this size.

7. Related documents

- Data Protection Policy
- Data Retention Policy and Schedule
- Record of Processing Activities
- Privacy Notice